

LPDES PERMIT NO. LA0007617, AI No. 1432

LPDES FACT SHEET and RATIONALE
FOR THE DRAFT MODIFIED LOUISIANA POLLUTANT DISCHARGE ELIMINATION SYSTEM
(LPDES) PERMIT TO DISCHARGE TO WATERS OF LOUISIANA

- I. **Company/Facility Name:** Graphic Packaging International, Inc.
West Monroe Paper Mill
Post Office Box 35800
West Monroe, Louisiana 71294
- II. **Issuing Office:** Louisiana Department of Environmental Quality
(LDEQ)
Office of Environmental Services
Post Office Box 4313
Baton Rouge, Louisiana 70821-4313
- III. **Prepared By:** Sonja Loyd
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Date Prepared: September 10, 2007

LAC 33:IX Citations: Unless otherwise stated, citations to LAC 33:IX refer to promulgated regulations listed at Louisiana Administrative Code, Title 33, Part IX.

40 CFR Citations: Unless otherwise stated, citations to 40 CFR refer to promulgated regulations listed at Title 40, Code of Federal Regulations in accordance with the dates specified at LAC 33:IX.2301.F, 4901, and 4903.

IV. **Permit Action/Status:**

A. **Reason For Permit Action:**

Modification of an existing Louisiana Pollutant Discharge Elimination System (LPDES) permit following the regulations promulgated at LAC 33:IX.3105/40 CFR 124.5. In accordance with LAC 33:IX.3105.B.2, only those permit limitations and conditions pertaining to the draft permit modifications are open for public comment.

- B. **LPDES permit:** Effective date - November 1, 2006
Expiration date - October 31, 2011

- C. **Date Modification Application Received:** The permit modification application was received on May 2, 2007. Supplemental information needed to complete the permitting process was received on September 19, 2007, and October 2, 2007.

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V. Facility Information:

- A. Location - 1000 Jonesboro Road in West Monroe, Ouachita Parish
(Latitude 32°29'07", Longitude 92°09'03")
- B. Applicant Activity - According to the application, Graphic Packaging International, Inc., West Monroe Paper Mill, is an integrated coated and uncoated pulp, paper, and paperboard mill.
- C. Fee Rate -
 - 1. Fee Rating Facility Type: Major
 - 2. Complexity Type: III
 - 3. Wastewater Type: II
 - 4. SIC codes: 2631 and 2621

VI. Receiving Waters:

STREAM - Ouachita River

BASIN AND SUBSEGMENT - Ouachita River, Subsegment No. 080101

- Designated Uses:
- a. primary contact recreation
 - b. secondary contact recreation
 - c. fish and wildlife propagation
 - d. drinking water supply

VII. Nature of Permit Modification:

The permittee has requested that the LPDES permit be modified to reflect the following:

- A. A revision of the variable daily maximum BOD₅ mass limits (seasonal hydrographic release discharge equations) for the current production rate and the projected increase in production based on Ouachita River flow data obtained from United States Geological Survey (U.S.G.S.) Flow Gauge Station No. 07367005 in West Monroe (See Appendix A for the 2007 Ouachita Total Maximum Daily Loading Summary). This change will provide a more appropriate hydrograph for the controlled discharge flows allowed at Outfall 001. The existing seasonal hydrographic release discharge equations for BOD₅, established in the current LPDES permit based on U.S.G.S. State Line Gauge Station No. 07364100 located between the Arkansas state line and Monroe, will be removed from the permit since the State Line gauge will be taken out of service due to the West Monroe gauge being placed into operational status.

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- B. A change in the flow gauge station used to determine the Ouachita River flow rate upstream of Outfall 001 for the purposes of calculating the revised variable daily maximum BOD₅ mass limits. The new flow gauge station will be changed to reflect U.S.G.S. Flow Gauge Station No. 07367005 in West Monroe.
- C. The addition of a provision (Part II, Paragraph U) which allows the combined discharge of treated mill wastewaters (Internal Outfall 401) and treated municipal and parish sanitary wastewater through a diffuser associated with Outfall 001. The discharges through the diffuser associated with Outfall 001 will only be used during normal operations (i.e. when the permittee calculates that its discharges will comply with the BOD₅ mass limits established at Outfall 001 without having to initiate a controlled discharge event). The intake structure for the diffuser will be located just upstream of the Outfall 001 flume.
- D. The permittee notified this Office of its intent to provide permit coverage for stormwater runoff from an area used to store creosote-treated railroad ties which will be used as an additional fuel source at the facility. All stormwater runoff from this area will be routed to the permittee's wastewater treatment system and ultimately discharge through Internal Outfall 401. A permit modification to include this wastestream is not needed since process and non-process area stormwater discharges are permitted at Internal Outfall 401 and due to the nature and infrequency of this discharge.

VIII. Proposed Changes:

- A. The revised variable daily maximum BOD₅ mass limits (seasonal hydrographic release discharge equations) for the current production rate and the projected increase in production based on Ouachita River flow data obtained from U.S.G.S. Flow Gauge Station No. 07367005 in West Monroe will be added in the permit to reflect the following:

Outfall 001 Daily Maximum BOD₅ Discharge Rate (See Part II, Paragraph I of the draft permit modification)

The daily maximum BOD₅ discharge rate at Outfall 001 shall be in accordance with the mathematical depiction of the hydrographic curves (See Appendix B for Revised Figures 1 and 2) as presented below.

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Phase I - Before Mill Production Increase

Summer Season (May - October):

Daily Maximum BOD₅ (lbs/day) = 4,532 lbs/day, for $Q < 888$ cfs
 Daily Maximum BOD₅ (lbs/day) = $6.60421Q - 1,333$, for $888 \text{ cfs} \leq Q \leq 5,686$ cfs
 Daily Maximum BOD₅ (lbs/day) = $0.63Q + 32,637$ lbs/day, for $Q > 5,686$ cfs

Winter Season (November - April):

Daily Maximum BOD₅ (lbs/day) = 7,364 lbs/day, for $Q < 1,336$ cfs
 Daily Maximum BOD₅ (lbs/day) = $6.60449Q - 1,460$, for $1,336 \text{ cfs} \leq Q \leq 5,705$ cfs
 Daily Maximum BOD₅ (lbs/day) = $0.63Q + 32,625$ lbs/day, for $Q > 5,705$ cfs

Phase II - After Mill Production Increase

Summer Season (May - October):

Daily Maximum BOD₅ (lbs/day) = 4,532 lbs/day, for $Q < 888$ cfs
 Daily Maximum BOD₅ (lbs/day) = $6.82573Q - 1,529$, for $888 \text{ cfs} \leq Q \leq 5,886$ cfs
 Daily Maximum BOD₅ (lbs/day) = $0.63Q + 34,939$ lbs/day, for $Q > 5,886$ cfs

Winter Season (November - April):

Daily Maximum BOD₅ (lbs/day) = 7,460 lbs/day, for $Q < 1,336$ cfs
 Daily Maximum BOD₅ (lbs/day) = $6.82578Q - 1,659$, for $1,336 \text{ cfs} \leq Q \leq 5,905$ cfs
 Daily Maximum BOD₅ (lbs/day) = $0.63Q + 34,927$ lbs/day, for $Q > 5,905$ cfs

Where Q = the 7 day running average of the Ouachita River flow at the West Monroe gauge in cfs.

- B. The flow gauge station used to determine the Ouachita River flow rate upstream of Outfall 001 for the purposes of calculating the revised variable daily maximum BOD₅ mass limits will be changed to reflect U.S.G.S. Flow Gauge Station No. 07367005 in West Monroe. See Part II, Paragraph L of the draft permit modification.
- C. A provision will be added which allows the combined discharge of treated mill wastewaters (Internal Outfall 401) and treated municipal and parish sanitary wastewater through a diffuser associated with Outfall 001. The discharges through the diffuser associated with Outfall 001 will only be used during normal operations (i.e. when the permittee calculates that its discharges will comply with the BOD₅ mass limits established at Outfall 001

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without having to initiate a controlled discharge event). The intake structure for the diffuser will be located just upstream of the Outfall 001 flume. See Part II, Paragraph U of the draft permit modification.

Please be advised that the following changes are also being proposed as a result of the modifications requested by the permittee:

The page numbering in the Part II Conditions (pages 1 through 22) has been modified due to changes that resulted in the removal and/or addition of language proposed in Part II, Paragraphs I, L, and U.

The wording in Part II, Paragraph J.2 was changed to read as follows: "The daily determination of actual BOD₅ concentration (mg/L) of the discharge from Outfall 001."

IX. COMPLIANCE HISTORY/DMR REVIEW:

- A. AMENDED COMPLIANCE ORDER & NOTICE OF POTENTIAL PENALTY WE-CN-05-0446 was issued on May 29, 2007. This compliance action amended information documented in the previously issued compliance action, cited effluent violations, and incorporated interim provisions that allow discharges through a diffuser associated with Outfall 001.

CONSOLIDATED COMPLIANCE ORDER & NOTICE OF POTENTIAL PENALTY WE-CN-05-0446 was issued January 3, 2006, for unauthorized discharges, effluent violations, and anticipated non-compliance with the BOD₅ limits as a result of low-flow conditions in the Ouachita River. This action required the permittee to comply with interim monitoring requirements during periods when BOD₅ levels in the effluent at Outfall 001 are anticipated to be in excess of the permitted limits in the LPDES permit and LWDPS permit.

- B. A DMR review of all of the monitoring reports for the period of September 2005 through September 2007 revealed several effluent violations. These violations have been addressed in AMENDED COMPLIANCE ORDER & NOTICE OF POTENTIAL PENALTY WE-CN-05-0446.
- C. The most recent inspection was performed on June 26, 2007. There were several areas of concern noted in the report which have been addressed in AMENDED COMPLIANCE ORDER & NOTICE OF POTENTIAL PENALTY WE-CN-05-0446.

X. "IT" Questions - Applicant's Responses

The "IT" Questions along with the permittee's responses can be found in the 2007 Permit Modification Application (dated May 2, 2007). See Appendix C.

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XI. Endangered Species:

The receiving waterbody, Subsegment No. 080101 of the Ouachita River Basin is not listed in Section II.2 of the Implementation Strategy as requiring consultation with the U.S. Fish and Wildlife Service (FWS). This strategy was submitted with a letter dated October 24, 2007 from Boggs (FWS) to Brown (LDEQ). Therefore, in accordance with the Memorandum of Understanding between the LDEQ and the FWS, no further informal (Section 7, Endangered Species Act) consultation is required. The effluent limitations established in the permit ensure protection of aquatic life and maintenance of the receiving water as aquatic habitat. Therefore, the issuance of the LPDES permit is not likely to have an adverse effect on any endangered or candidate species or the critical habitat.

XII. Historic Sites:

The discharge is from an existing facility location, which does not include an expansion on undisturbed soils. Therefore, there should be no potential effect to sites or properties on or eligible for listing on the National Register of Historic Places, and in accordance with the "Memorandum of Understanding for the Protection of Historic Properties in Louisiana Regarding LPDES Permits" no consultation with the Louisiana State Historic Preservation Officer is required.

XIII. Tentative Determination:

On the basis of preliminary staff review, the Department of Environmental Quality has made a tentative determination to modify the permit for the discharge described in the application.

XIV. Variances:

No requests for variances have been received by this Office.

XV. Public Notices:

Upon publication of the public notice, a public comment period shall begin on the date of publication and last for at least 30 days thereafter. During this period, any interested persons may submit written comments on the draft permit modification and may request a public hearing to clarify issues involved in the permit decision at this Office's address on the first page of the fact sheet. A request for a public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing.

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Public notice published in:

Local newspaper of general circulation

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